



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

FEB 27 2015

GENERAL NOTICE LETTER -- URGENT LEGAL MATTER

PROMPT REPLY NECESSARY, CERTIFIED MAIL: #7014 0150 0000 2452 7923

RETURN RECEIPT REQUESTED

Sierra Chemical Corporation
228 Crest Lake Drive
Hoover, Alabama 35244

RE: General Notice Letter for the CES Environmental Services, Inc.- Houston Superfund Site in
Houston, Harris County, Texas

Dear Sir/Madam:

The purpose of this letter is to notify you of your potential liability at the CES Environmental Services, Inc.- Houston Superfund Site (Site) and to invite you to join in settlement negotiations with the U.S. Environmental Protection Agency (EPA). The street address for the Site is 4904 Griggs Road, Houston, Harris County, Texas. The street addresses of the contiguous properties that are parts of the Site are 4900 Griggs Road and 5910 Wayland Street. The Site is surrounded by residential, educational and commercial properties. Based on available information, the EPA has determined that you may be responsible under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, for cleanup of the Site or costs the EPA has incurred in cleaning up the Site.

Explanation of Potential Liability

A Superfund Site is a place that is contaminated with hazardous substances at levels that may present a threat to human health or the environment. Under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, potentially responsible parties (PRPs) may be required to perform cleanup actions to protect the public health and welfare or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site. PRPs include current and former owners and operators of the Site, as well as persons who sent or transported hazardous substances to the Site for disposal or treatment or who arranged for the disposal or treatment of hazardous substances at the Site.

Under CERCLA, specifically Sections 106(a) and 107(a), PRPs may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site, unless the PRP can show divisibility of harm or any of the statutory defenses. PRPs include current and former owners and operators of a site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

You have been identified as a PRP who either sent hazardous substances for disposal or treatment to the Site or generated certain hazardous substances that the EPA has found at the Site. For this reason the attached General Notice concerning the removal action (Enclosure 1) is being sent to you. The General Notice requests your cooperation in conducting the on-going removal action at the Site and for reimbursement of past and future costs. Enclosure 2 contains copies of the documents used to identify you as a PRP. Enclosure 3 contains a list of the entities who are receiving this General Notice.

Site Background

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. Prior to the bankruptcy, the Site had been owned and operated by CES Environmental Services, Inc. The Site is now under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the Site. The Site consists of approximately eleven vacuum boxes, two roll-off boxes, twelve frac tanks, two tanker trailers, 20 aboveground storage tanks, 15 waste water treatment tanks, waste piles, and numerous totes, vats, drums, and smaller containers. Additionally, there was spillage of chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Removal is time critical per the Action Memo.

The information provided by the Estate's consultant shows that there are hazardous wastes along with various hazardous substances within containers located on the Site. The hazardous substances include but are not limited to benzene (D018), creosol (D023-026), 2,4,6-trichlorophenol (D042), pH (D002), ignitability (D001), MEK (D035), and 1,2-dichloroethane (D028). These chemicals are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. 302.4.

Response Actions to Date

On or about September 3, 2014, the EPA mobilized its contractors to begin addressing the wastes and spills at the Site. The EPA's Time Critical Removal Action has addressed the following:

1. Management of stormwater to reduce off-site overflow of contaminated stormwater from the Site.
2. Removal of wastes from ten of twelve vacuum boxes and from two of two roll-off boxes.
3. Removal of wastes from eight of twelve frac tanks. Three frac tanks currently hold wastes.
4. Removal of liquid, i.e., pump able, wastes from eleven of twenty-three aboveground storage tanks (AST). Sludge and residual materials remain until sludge removal and tank cleaning of ASTs is completed.
5. Empty totes/drums have been segregated for temporary storage.
6. Waste piles dumped to the ground from the theft of seven roll-off boxes was removed by the Trustee.
7. Lab chemicals/company process samples were collected and disposed by the Trustee.
8. Process chemicals were collected and disposed by the Trustee.

Upon reviewing the enclosed General Notice, please provide a written response to Mr. Robert Werner, Enforcement Officer at 214-665-6724 within **60 calendar days** after you receive this letter. Your response must identify of your intent to, or not to, enter into settlement negotiations with the EPA concerning this matter. Please mail your written response to Mr. Werner at the address that appears in the General Notice.

We look forward to working with you during the coming months.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carl E. Edlund, P.E.", with a flourish at the end.

Carl E. Edlund, P.E.

Director

Superfund Division

Enclosures (4)

ENCLOSURE 1
GENERAL NOTICE REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

This General Notice is from the U.S. Environmental Protection Agency (EPA). This General Notice is directed to you, the Potentially Responsible Party (PRP) of the CES Environmental Services, Inc.- Houston Site (Site). This General Notice does five things:

1. This General Notice tells you that you may be responsible for the presence of hazardous substances found at the Site. When we say "Site" or "property" in this General Notice, we mean the CES Environmental Services, Inc.- Houston Site. The street address for the Site is 4904 Griggs Road, Houston, Harris County, Texas. The street addresses of the contiguous properties that are parts of the Site are 4900 Griggs Road and 5910 Wayland Street. This General Notice is issued under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund).
2. This General Notice provides you with background information leading up to the EPA's investigation of the Site and the EPA's activities to determine the source(s) of the contamination at the Site.
3. This General Notice invites you to meet and enter a settlement with the EPA as a Settling Party regarding the cleanup of this Site and cooperation in conducting the on-going removal action at the Site and for reimbursement of past and future costs.
4. This General Notice advises you that, if you request the EPA to do so, the EPA will consider your ability to pay in determining an appropriate settlement amount.
5. This General Notice provides to you the names of all entities, i.e., PRPs, to which this General Notice will be mailed.

NOTICE THAT YOU MAY BE LIABLE

Under Section 107 of CERCLA, 42 U.S.C. § 9607, responsible parties are those who are current owners or operators of a facility, past owners or operators who owned or operated the facility at the time hazardous substances were released or disposed of at the facility, persons who arranged for disposal or treatment at the facility (usually the person(s) who generated the hazardous substance) or persons who selected that facility and transported the hazardous substances to the facility. Section 107 of CERCLA, 42 U.S.C. § 9607, states that responsible parties are liable to the United States for the costs it has incurred or will incur conducting a response action such as that proposed for the Site. A PRP is therefore responsible for performing the cleanup action in accordance with the EPA requirements, paying for the cleanup by the EPA and reimbursing the Federal Government for past and future costs of the cleanup activities.

BACKGROUND

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. Prior to the bankruptcy, the Site had been owned and operated by CES Environmental Services, Inc. The Site is now under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the Site. The Site consists of approximately eleven vacuum boxes, two roll-off boxes, twelve frac tanks, two tanker trailers, twenty aboveground storage tanks, fifteen waste water treatment tanks, waste piles, and numerous totes, vats, drums, and smaller containers. Additionally, there is spillage of

chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Emergency responses to these spills have involved the Estate, City of Houston, Texas Commission on Environmental Quality (TCEQ) and the EPA. These spill responses were addressed by TCEQ and the EPA.

The information provided by the Estate's consultant shows that there are hazardous wastes along with various hazardous substances within containers located on the Site. The hazardous substances include but are not limited to Benzene (D018), Creosol (D023-026), 2,4,6-Trichlorophenol (D042), pH (D002), Ignitability (D001), MEK (D035), and 1,2-Dichloroethane (D028). These chemicals are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14), and further defined at 40 C.F.R. 302.4.

Response Actions to Date

On or about September 3, 2014, the EPA mobilized its contractors to begin addressing the wastes and spills at the Site. As of December 19, 2014, the EPA Team has addressed the following:

1. Management of stormwater to reduce off-site overflow of contaminated stormwater from the Site.
2. Removal of wastes from ten of twelve vacuum boxes and from two of two roll-off boxes.
3. Removal of wastes from eight of twelve frac tanks. Three frac tanks currently hold wastes.
4. Removal of liquid, i.e., pump able, wastes from eleven of twenty-three aboveground storage tanks (AST). Sludge and residual materials remain until sludge removal and tank cleaning of ASTs is completed.
5. Empty totes/drums have been segregated for temporary storage.
6. Waste piles dumped to the ground from the theft of seven roll-off boxes was removed by the Trustee.
7. Lab chemicals/company process samples were collected and disposed by the Trustee.
8. Process chemicals were collected and disposed by the Trustee.

PARTICIPATION

The EPA is inviting you to enter into a settlement with the EPA. In addition to avoiding the costs of litigation, settling with the EPA provides you with another advantage. Under the Superfund law, settling with the EPA helps protect you should another responsible party sue you for costs which that party pays to the EPA. Also, if you choose not to settle with the EPA, then the EPA may take civil administrative action and, ultimately, the EPA may request civil judicial action. A list of entities receiving this General Notice letter is included as Enclosure 3 to this letter.

OPPORTUNITY TO MEET

The EPA will also provide you the opportunity to meet with the EPA representatives to discuss your desire to enter into a settlement with the EPA.

FINANCIAL CONCERNS/ABILITY TO PAY SETTLEMENTS

The EPA is aware the financial ability of some PRPs to contribute toward the cleanup and/or payment of response costs at a site may be substantially limited. If you believe and can document that you fall within that category, please contact Mr. Robert Werner at 214-665-6724 for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements. If the EPA concludes that you have a legitimate inability to pay the full amount of the EPA's costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that because the EPA has a potential claim against you, if your financial status changes in any significant way, i.e., filing for bankruptcy, you must include the EPA as a creditor.

RESOURCES AND INFORMATION FOR SMALL BUSINESSES

On January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at:

<http://www.epa.gov/swerosps/bf/sblbra.htm>

and review the EPA guidance regarding these exemptions at:

<http://www.epa.gov/compliance/resources/policies/cleanup/superfund>

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers, which offer various forms of resources to small businesses. You may inquire about these resources at www.epa.gov.

In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo. Finally, the EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA), which is enclosed with this letter (Enclosure 4).

YOUR RESPONSE TO EPA

Please notify Mr. Werner in writing at the address indicated below *within 60 calendar days after you receive this letter* to indicate your willingness to enter in good faith as a Settling Party. **If the EPA does not receive your written response within 60 calendar days after you receive this letter, the EPA will assume you do not wish be a Settling Party and the EPA will then take whatever actions are necessary to abate the potential threat to human health and the environment posed by contaminants on the property.**

Your response to this letter should be directed to:

Mr. Robert Werner
Enforcement Officer (6SF-TE)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202
Telephone: 214-665-6724, Fax: 214-665-6660
werner.robert@epa.gov

If you or your attorney have legal questions pertaining to this matter, please direct them to:

Ms. Amy Salinas
Assistant Regional Counsel (6RC-S)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202
Telephone: 214-665-8063, Fax: 214-665-6460
salinas.amy@epa.gov

The discussions of fact or law in this General Notice are meant to help you understand CERCLA and the EPA's actions at the Site. The discussions of fact and law are not final positions on any matter discussed in this General Notice.

ENCLOSURE 2
GENERAL NOTICE REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

EVIDENTIARY DOCUMENTATION

SAMPLES OF EVIDENCE

Enclosed are copies of samples of documented evidence that identifies the name of your company. The examples are not intended to represent all the evidence in CES records. It is only a representative sample that identifies:

1. A waste hazardous substance that was generated by your company and was transported to the Site for disposal and/or recycling, or
2. A waste hazardous substance that was generated by your company and that was transported in a CES tanker trailer to a facility other than the Site for disposal and/or recycling. The EPA believes that residue of the waste hazardous substance that had been transported in the CES tanker trailer was released at the Site when the interior of the CES tanker trailer was cleaned at the Site.



**CES Environmental
Services, Inc.**

4904 Griggs Road
Houston, TX 77021
Phone: (713) 676-1460
Fax: (713) 676-1676

copy

Invoice

Date	Invoice #
7/2/2009	57422

Bill To: Sierra Chemical Corp.
4524 Southlake Parkway
Suite 34 / P.M.B.
Hoover, AL 35244

		P.O. No.	Terms	Project	
			Net 30		
Quantity	Description	Manifest #	Rate	Amount	
	6/27/09				
1	Transportation services by CES @ \$1350.00 per load		1,350.00	1,350.00	
1.5	Loading demurrage @ \$69.00 per hour		69.00	103.50	
	9.5% Fuel Surcharge		138.08	138.08	
3,710	Recycling of flammable liquids (coker gas contact water) @ \$0.50 per gallon	BOL 88267	0.50	1,855.00	
	Washout Trailer #260		175.00	175.00	
1	Weekend Call-Out Fee @ \$100.00 per driver		100.00	100.00	
1	Transportation services by CES @ \$1350.00 per load		1,350.00	1,350.00	
1.75	Loading demurrage @ \$69.00 per hour		69.00	120.75	
	9.5% Fuel Surcharge		139.72	139.72	
4,025	Recycling of flammable liquids (coker gas contact water) @ \$0.50 per gallon	BOL 88266	0.50	2,012.50	
	Washout of Trailer #254		175.00	175.00	
1	Weekend Call-Out Fee @ \$100.00 per driver		100.00	100.00	
We appreciate your business!		Subtotal			
Late Payment Policy: Any unpaid balances begining on the 30th day after the account is due will accrue a per annum interest rate of 7.5%, unless otherwise stated in a formalized contract.		Sales Tax (8.25%)			
		Total			



**CES Environmental
Services, Inc.**

4904 Griggs Road
Houston, TX 77021
Phone: (713) 676-1460
Fax: (713) 676-1676



Date	Credit Memo #
4/2/2009	55410

Bill To: Sierra Chemical Corp.
4524 Southlake Parkway
Suite 34 / P.M.B.
Hoover, AL 35244

		P.O. No.	Terms	Project	
			Net 30		
Quantity	Description	Manifest #	Rate	Amount	
-49,223	CREDIT \$0.10 per gallon coker gas contact water --- 10 loads March 2009		0.10	-4,922.30	
	CREDIT 1% Compliance Fee		49.22	-49.22	
	Ref Invoice #55054,55055,55056,55057,55058, 55059,55116,55181,55301				
We appreciate your business!		Subtotal		\$-4,971.52	
		Sales Tax (8.25%)		\$0.00	
		Total		\$-4,971.52	



4904 Griggs Road
Houston, TX 77021
Phone: (713) 676-1460
Fax: (713) 676-1676

Invoice

Date	Invoice #
3/31/2009	55301

COPY

Bill To: Sierra Chemical Corp.
4524 Southlake Parkway
Suite 34 / P.M.B.
Hoover, AL 35244

		P.O. No.	Terms	Project	
			Net 30		
Quantity	Description	Manifest #	Rate	Amount	
	03/26/09				
1	Transportation services by CES @ \$1350.00 per load		1,350.00	1,350.00	
1.75	Loading demurrage @ \$69.00 per hour		69.00	120.75	
	9% Fuel Surcharge		132.37	132.37	
3,735	Recycling of flammable liquids (coker gas contact water) @ \$0.60 per gallon	BOL 83542	0.60	2,241.00	
	1% Compliance Fee		38.45	38.45	
	CES job #83542				
We appreciate your business!			Subtotal	\$3,882.57	
Late Payment Policy: Any unpaid balances beginning on the 30th day after the account is due will accrue a per annum interest rate of 7.5%, unless otherwise stated in a formalized contract.			Sales Tax (8.25%)	\$0.00	
			Total	\$3,882.57	



**CES Environmental
Services, Inc.**

4904 Griggs Road
Houston, TX 77021
Phone: (713) 676-1460
Fax: (713) 676-1676

Invoice

Date	Invoice #
3/27/2009	55181

COPY

Bill To: Sierra Chemical Corp.
4524 Southlake Parkway
Suite 34 / P.M.B.
Hoover, AL 35244

		P.O. No.	Terms	Project	
			Net 30		
Quantity	Description	Manifest #	Rate	Amount	
	03/19/09				
1	Transportation services by CES @ \$1350.00 per load		1,350.00	1,350.00	
	9% Fuel Surcharge		121.50	121.50	
3,955	Disposal of flammable liquids (coker gas contact water) @ \$0.60 per gallon	BOL 82607	0.60	2,373.00	
1	Washout #259	25402	175.00	175.00	
	1% Compliance Fee		40.20	40.20	
	CES job #82607				
We appreciate your business!			Subtotal	\$4,059.70	
Late Payment Policy: Any unpaid balances beginning on the 30th day after the account is due will accrue a per annum interest rate of 7.5%, unless otherwise stated in a formalized contract.			Sales Tax (8.25%)	\$0.00	
			Total	\$4,059.70	



**CES Environmental
Services, Inc.**

4904 Griggs Road
Houston, TX 77021
Phone: (713) 676-1460
Fax: (713) 676-1676

Invoice

Date	Invoice #
3/25/2009	55116

copy

Bill To: Sierra Chemical Corp.
4524 Southlake Parkway
Suite 34 / P.M.B.
Hoover, AL 35244

		P.O. No.	Terms	Project	
			Net 30		
Quantity	Description	Manifest #	Rate	Amount	
	03/13/09				
1	Transportation services by CES @ \$1350.00 per load		1,350.00	1,350.00	
	9% Fuel Surcharge		121.50	121.50	
5,355	Recycling of flammable liquids (coker gas contact water) @ \$0.60 per gallon	BOL 82603	0.60	3,213.00	
	1% Compliance Fee		46.85	46.85	
	CES job #82603				
We appreciate your business!			Subtotal	\$4,731.35	
Late Payment Policy: Any unpaid balances beginning on the 30th day after the account is due will accrue a per annum interest rate of 7.5%, unless otherwise stated in a formalized contract.			Sales Tax (8.25%)	\$0.00	
			Total	\$4,731.35	

EPAHO121000874



4904 Griggs Road
Houston, TX 77021
Tel. (713) 676-1460
Fax. (713) 676-1676

To: Joy Baker
Cc: Matt Bowman, Clint Hopkins, Prabhaker, Sam Brown

Date: 5/19/09

From: Miles Root

Lab Memo: 09-093

Subject: **Sierra Chemical Evaluations 0509-18 thru 21**

Four different samples of waste material from **Sierra Chemical (Cameron Compression)**, have been evaluated for potential processing/use at CES/PACES. These four samples are evaluations 0509-18 thru 21. A summary of each sample follows.

Evaluation 0509-18 is a spent sulfuric acid. The potential volume is one load every two months. This sample has a density of 1.370. An addition of 50% NaOH to neutralize this acid shows it to be just under 50%. These two pieces of data indicate that this acid is around 47% wt% sulfuric acid.

It is clean looking material which springs out crude cresylic acid or liberates hydrogen sulfide from spent caustics. I treated this sample as water just to see how it would process. Of course it requires an excessive amount of caustic for it to be neutralized, but the water produced is good looking with low metals. Since it will add value to our business as an acid we should use it in that capacity. I recommend that we try this acid at PACES in either our cresylic acid or NaSH production process.

Evaluation 0509-19 is some type of spent caustic. The potential volume of this material is one load per quarter. This sample has a density of 1.147, which should equate to 15% caustic. A titration shows this caustic to be 8.8 wt% as NaOH, but it does contain a significant amount of sodium carbonate as well. Its high carbonate content is indicated by the excessive foaming noted during the titration with HCl. Sodium carbonate will not be a part of any reaction for strengthening our NaSH production, and will actually lower the sulfide component. Currently we get no compensation for the carbonates in our NaSH product.

The strength of usable caustic is too low for profitable use at PACES. Metals on the neat sample show very high zinc and chromium. If we can make some good money for taking this material then it needs to go to PACES. We can put it into the NaSH product tank to consume the small amount of hydrogen sulfide that it will do. It will not make us any money on the NaSH sales side so we need to cover our costs up front. I don't see a better option if we really want to take this material.

Evaluation 0509-20 is waste water. The potential volume is three loads per month. This water has a pH of 6 and contains orange/brown silt from its previous use. When treated, it produces an extremely high volume of solids which I estimate to be at least 75% when spun down. Metals and TOC are low, with no phenols. Odor is not an issue. We can treat this water at CES but need to price as though we are going to filter press this entire load, as that may happen.



4904 Griggs Road
Houston, TX 77021
Tel. (713) 676-1460
Fax. (713) 676-1676

Evaluation 0509-21 is an unknown cleaning solution. It is called CL 2000 spent acid. The potential volume of this material is four totes per quarter. It has a pH of around 3 but does not act like it has much acid strength left in it. When reacted with sulfidic caustic its reaction causes only a trace quantity of hydrogen sulfide to be released. It also forms an emulsion looking product that will need to be disposed. Odor is not really an issue with this stream.

This material contains a soap or detergent as it foams when shaken, and the foam remains for quite some time afterwards. This material does not really treat. It forms a sludge when mixed with caustic and/or lime that never separates out into anything that can be processed. Metals on the neat sample are extremely high in zinc and chromium.

This is not an acid that will add value to CES or PACES, nor does it respond to waste water treatment. Since it is only four totes per quarter our only logical processing scheme is to bring it into CES and slowly process it over time into our tanks. The volume of sludge that is produced will evenly distribute itself out over thousands of gallons of water. These four totes will all end up in our filter cake box over time. If our pricing will be high enough to cover this considerable amount of extra handling that will be involved and we can make some good money, then this is an option we should seriously consider.

The table below summarizes the analytical data and recommendations on the above samples.

Sierra Chemicals				
Evaluations 0509-18 thru 21				
	0509-18	0509-19	0509-20	0509-21
H2SO4, wt%	47			
NaOH, wt%		8.8		
Specific Gravity	1.137	1.147		
CES Use	No	No	Yes	Yes
PACES Use	Yes	Yes	No	No
Odor Issues	None	None	None	None
Treatability	Use @ PACES	N/A	Difficult	Very Difficult
Phenols, ppm			0	0
Metals			Treated Sx	Untreated Sx
Ni			0.11	71
Zn			0.022	2.432
Cu			0.032	0.558
Cd			0.01	0.146
Cr			0	174
Recommended?	Yes	Yes	Yes	Yes



4904 Griggs Road
Houston TX 77021
Tel. (713) 676-1460
Fax. (713) 676-1460

Waste Pre-Acceptance/Approval Letter

Date 6/5/2009

Dear Lee Pinson

Thank you for choosing CES Environmental Services, Inc. for your waste disposal and/or recycling needs. The following waste stream has been approved at our facility in Houston, TX. If the waste received does not conform to the profile, then rejection or additional charges may apply.

CES Profile # PA-3356

Expiration Date 6/3/2011

Generator: Cameron Compression Systems

Address: 600 South First Street
Ponca City, OK 74604

Waste Information

Name of Waste: Copper sulfate solution

TCEQ Waste Code # product

Container Type:

Detailed Description of Process Generating Waste:

used acidic plating "this product is NOT waste, it is being used for its intended purpose"

Color: blue

Odor: mild

pH: <1

Physical State:

Incompatibilities: strong bases/caustic

Safety Related Data/Special Handling:

standard PPE

If you have any questions concerning this approval and/or the conditions, then please feel free to contact our office at (713) 676-1460.

Thank you,

Matt Bowman, President
CES Environmental Services, Inc.



4904 Griggs Road
Houston TX 77021
Tel. (713) 676-1460
Fax. (713) 676-1460

Waste Pre-Acceptance/Approval Letter

Date 6/5/2009

Dear Lee Pinson

Thank you for choosing CES Environmental Services, Inc. for your waste disposal and/or recycling needs. The following waste stream has been approved at our facility in Houston, TX. If the waste received does not conform to the profile, then rejection or additional charges may apply.

CES Profile # PA-3357

Expiration Date 6/3/2011

Generator: Cameron Compression Systems

Address: 600 South First Street
Ponca City, OK 74604

Waste Information

Name of Waste: Sodium hydroxide solution

TCEQ Waste Code # Product

Container Type:

Detailed Description of Process Generating Waste:

used plating solution "this material is not a waste, it is product being used for what its intended purpose"

Color: varies

Odor: mild

pH: >14

Physical State:

Incompatibilities: strong acids

Safety Related Data/Special Handling:

standard PPE

If you have any questions concerning this approval and/or the conditions, then please feel free to contact our office at (713) 676-1460.

Thank you,

Matt Bowman, President
CES Environmental Services, Inc.



4904 Griggs Road
Houston TX 77021
Tel. (713) 676-1460
Fax. (713) 676-1460

Waste Pre-Acceptance/Approval Letter

Date 6/3/2009

Dear Lee Pinson

Thank you for choosing CES Environmental Services, Inc. for your waste disposal and/or recycling needs. The following waste stream has been approved at our facility in Houston, TX. If the waste received does not conform to the profile, then rejection or additional charges may apply.

CES Profile # PA-3356

Expiration Date 6/3/2011

Generator: Cameron Compression Systems

Address: 600 South First Street
Ponca City, OK 74604

Waste Information

Name of Waste: Copper sulfate solution

TCEQ Waste Code #: product

Container Type:

Detailed Description of Process Generating Waste:

used acidic plating "this product is NOT waste, it is being used for its intended purpose"

Color: blue

Odor: mild

pH: <1

Physical State:

Incompatibilities: strong bases/caustic

Safety Related Data/Special Handling:

standard PPE

If you have any questions concerning this approval and/or the conditions, then please feel free to contact our office at (713) 676-1460.

Thank you,

Matt Bowman, President
CES Environmental Services, Inc.

EPAHO082001409



4904 Griggs Road
Houston TX 77021
Tel. (713) 676-1460
Fax. (713) 676-1460

Waste Pre-Acceptance/Approval Letter

Date 6/3/2009

Dear Lee Pinson

Thank you for choosing CES Environmental Services, Inc. for your waste disposal and/or recycling needs. The following waste stream has been approved at our facility in Houston, TX. If the waste received does not conform to the profile, then rejection or additional charges may apply.

CES Profile # PA-3357

Expiration Date 6/3/2011

Generator: Cameron Compression Systems

Address: 600 South First Street
Ponca City, OK 74604

Waste Information

Name of Waste: Sodium hydroxide solution

TCEQ Waste Code #: Product

Container Type:

Detailed Description of Process Generating Waste:

used plating solution "this material is not a waste, it is product being used for what its intended purpose"

Color: varies

Odor: mild

pH: >14

Physical State:

Incompatibilities: strong acids

Safety Related Data/Special Handling:

standard PPE

If you have any questions concerning this approval and/or the conditions, then please feel free to contact our office at (713) 676-1460.

Thank you,

Matt Bowman, President
CES Environmental Services, Inc.

EPAHO082001418



4904 Griggs Road
Houston TX 77021
Tel. (713) 676-1460
Fax. (713) 676-1460

Waste Pre-Acceptance/Approval Letter

Date 6/24/2009

Dear Lee Pinson

Thank you for choosing CES Environmental Services, Inc. for your waste disposal and/or recycling needs. The following waste stream has been approved at our facility in Houston, TX. If the waste received does not conform to the profile, then rejection or additional charges may apply.

CES Profile # HOU-3394

Expiration Date 6/24/2011

Generator: Cameron Compression Systems

Address: 600 South First Street
Ponca City, OK 74604

Waste Information

Name of Waste: Oily Absorbent

TCEQ Waste Code #: OUTS3101

Container Type:

Detailed Description of Process Generating Waste:

Absorbent contaminated with oil from metals finishing and manufacturing.

Color: Varies **Odor:** Varies/hydrocarbon **pH:** 3-11

Physical State:

Incompatibilities: Strong oxidizers

Safety Related Data/Special Handling:

Standard PPE

If you have any questions concerning this approval and/or the conditions, then please feel free to contact our office at (713) 676-1460.

Thank you,

Matt Bowman, President
CES Environmental Services, Inc.

EPAHO082001427

ENCLOSURE 3
GENERAL NOTICE LETTER REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

ENTITIES TO WHICH THIS GENERAL NOTICE WILL BE MAILED

The Lubrizol Corporation
Advanced Aromatics, L.P
AMTEX Machine Products, Inc.
Andergauge Drilling Systems
Arkema Inc.
Ball Corporation
Canrig Drilling Technology Ltd.
Century Asphalt (Humble) d/b/a for Baytown Asphalt Materials, Ltd.
Champion Technologies (Merged into Nalco Company)
Citgo Petroleum Corporation (Citgo Refinery)
Cross Oil & Refining & Marketing, Inc..
Dover Corporation - Cook Compression (C Lee Cook)
Evalca Company of America
KMCO, Inc. (new name is Ramsey Properties, L.P.)
PGI International, LTD (merged into Parker-Hannifin Corporation)
Philip Reclamation Services Houston, LLC
Plaquemine Point Shipyard, Sunshine, LA
PPG Industries, Inc.
Praxair, Inc.
Proler Southwest
Quest Chemical Corporation
RasGas in Qatar @ KMTEX
Sierra Chemical Corporation
Skyhawk Chemicals, Inc.
Smithfield BioEnergy, LLC
Sun Coast Resources, Inc.
T. T. Barge Mile (Barge Mile 183, 237)
T. T. Barge Cleaning Mile 183, Inc. (d/b/a T.T. Barge [Mile 183])
T. T. Barges Services Mile 237 LLC (d/b/a T T Barge Mile [Barge Mile 237])
T.T. Barge (Mile 237)
T3 Energy Services-Cypress
Taber Extrusions
Targa Midstream Services LP
Tenaris Coiled Tube, LLC (Beitway 8) a-k-a Precision Tube
Texas Oil Tools, NOV (Conroe)

Texas Water Management

Total Petrochemicals, Inc. - Port Arthur

Transmontaing Product Service

Valero Refining-Texas, L.P. (d/b/a Valero Refining Co of Texas)

ZaCh System Corporation (Ampac)

ENCLOSURE 4
GENERAL NOTICE LETTER REGARDING
CES ENVIRONMENTAL SERVICES, INC.- HOUSTON
HOUSTON, HARRIS COUNTY, TEXAS

SMALL BUSINESS RESOURCES FACT SHEET



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture

(www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry

(www.ecarcenter.org)

Automotive Service and Repair

(www.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry

(www.chemalliance.org)

Construction Industry

(www.cicacenter.org or 1-734-995-4911)

Education

(www.campuserc.org)

Healthcare Industry

(www.hercenter.org or 1-734-995-4911)

Metal Finishing

(www.nmfrc.org or 1-734-995-4911)

Paints and Coatings

(www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing

(www.pwborc.org or 1-734-995-4911)

Printing

(www.pneac.org or 1-888-USPNEAC)

Transportation Industry

(www.transource.org)

Tribal Governments and Indian Country

(www.epa.gov/tribal/compliance or 202-564-2516)

US Border Environmental Issues

(www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators

(www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page

www.epa.gov

Small Business Gateway

www.epa.gov/smallbusiness

Compliance Assistance Home Page

www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance

www.epa.gov/compliance

Voluntary Partnership Programs

www.epa.gov/partners



U.S. EPA SMALL BUSINESS RESOURCES

Hotlines, Helplines & Clearinghouses

(www.epa.gov/epahome/hotline.htm)

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

Clean Air Technology Center

(www.epa.gov/ttn/catc or 1-919-541-0800)

Emergency Planning and Community Right-To-Know Act

(www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346)

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information.

(www.epa.gov/sbo or 1-800-368-5888)

The National Environmental Compliance Assistance

Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers.
(www.epa.gov/clearinghouse)

National Response Center to report oil and hazardous substance spills.

(www.nrc.uscg.mil or 1-800-424-8802)

Pollution Prevention Information Clearinghouse

(www.epa.gov/opptintr/ppic or 1-202-566-0799)

Safe Drinking Water Hotline

(www.epa.gov/safewater/hotline/index.html or 1-800-426-4791)

Stratospheric Ozone Refrigerants Information

(www.epa.gov/ozone or 1-800-296-1996)

Toxics Assistance Information Service also includes asbestos inquiries.

(1-202-554-1404)

Wetlands Helpline

(www.epa.gov/owow/wetlands/welline.html or 1-800-832-7828)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

EPA's Small Business Ombudsman

(www.epa.gov/sbo or 1-800-368-5888)

Small Business Environmental Homepage

(www.smallbiz-enviroweb.org or 1-724-452-4722)

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated,

businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses:

The Small Business Compliance Policy

(www.epa.gov/compliance/incentives/smallbusiness)

Audit Policy

(www.epa.gov/compliance/incentives/auditing)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.